

## REMARKS

Favorable reconsideration of this application is respectfully requested in view of the following remarks.

Appreciation is expressed to Examiner Garrett for the indication that Claims 5-8 and 15-20 would be allowable if rewritten in independent form.

By way of this Amendment, Claims 19 is amended to correct a minor typographical error. In addition, Claims 1, 3 and 9-11 remain canceled, while new Claims 21-25 are presented for consideration. Thus, the claims currently at issue in this application are Claims 2, 4-8 and 12-25, with Claims 1, 12 and 13 being the only independent claims.

The Official Action sets forth an anticipatory rejection of independent Claims 2, 12 and 13 based on the disclosure in U.S. Patent No. 6,439,636 to *Kuo*. That rejection is respectfully traversed for at least the following reasons.

The vehicle seat assembly recited in independent Claims 2 and 12 comprises a seatback, a seat cushion, and a link mechanism supporting the seat cushion. In addition, a drive unit drives the link mechanism to move the seat cushion between the seating position and the stowed position. As set forth in Claims 2 and 12, the drive unit comprises a first drive unit that moves the seat cushion and a second drive unit that moves the seatback, with the first and second drive units operating in association with each other for simultaneously operating the seat cushion and the seatback. This claimed construction is quite different from that disclosed in *Kuo*. Indeed, the rejection based on *Kuo* appears to be based on a misunderstanding concerning what *Kuo* discloses.

*Kuo* discloses a set of electrically actuated vehicle reclining seats which each include a back rest 72 and a seat 60. *Kuo* describes beginning in line 7 of column 6 that a motor drive is provided for operating the back rest 72 and seat 60, and that the motor drive includes a worm gear 86 rotatably coupled to a motor 88 which is connected to a threaded shaft 90 disposed within the worm gear 86. In addition, a pivoting nut 92 is attached to the bottom 76 of the back rest. *Kuo* specifically states in lines 41-44 of column 6 that the operation of the motor 88 simultaneously pivots both the back rest 72 and the seat 60.

It is thus respectfully submitted that *Kuo* does not disclose a drive unit similar to that recited in Claims 2 and 12. As claimed, the drive unit comprises a first drive unit that moves the seat cushion and a second drive unit that moves the seatback. This is quite different from *Kuo*'s disclosure of a single motor 88 that simultaneously moves the back rest 72 and the seat 60. It is thus respectfully submitted that the anticipatory rejection of independent Claims 2 and 12 is not appropriate and should be withdrawn.

Independent Claim 13 recites that the vehicle seat assembly comprises a seatback, a seat cushion, a link mechanism supporting the seat cushion, and a motor-operated drive unit that drives the link mechanism and moves the seat cushion between a seating position and a stowed position. In addition, Claim 13 recites that the link mechanism includes a first link mechanism that moves the seat cushion and a second link mechanism for simultaneously moving the first link mechanism and the seatback.

The arrangement illustrated in Figs. 9-14 of *Kuo* includes a number of links, but *Kuo* does not disclose a link mechanism comprising a first link mechanism that

moves the seat 60 and a second link mechanism that simultaneously moves the first link mechanism and the back rest 72. It is thus respectfully submitted that independent Claim 13 is also allowable.

New dependent Claims 21-25 define further distinguishing aspects of the seat assembly. For example, Claims 21-23 recite that the seatback is positioned on top of the seat cushion when the seat cushion is in the stowed position. Claims 24 and 25 recite that the seatback is a single seatback and is the only seatback of the seat assembly, while the seat cushion is a single seat cushion and is the only seat cushion of the seat assembly. These claims further distinguish the vehicle seat assembly at issue here over the disclosure in *Kuo*.

Early and favorable action regarding this application is respectfully requested.

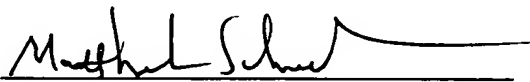
Should any questions arise in connection with this application or should the Examiner believe that a telephone conference with the undersigned would be helpful in resolving any remaining issues pertaining to this application the undersigned respectfully requests that he be contacted at the number indicated below.

Respectfully submitted,

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